

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

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GREGORY MACLEAN, RICK VALLES,  
 ARDESHIR PEZESHKI, JAMES GIBBS, and  
 RONALD HEMENWAY, *individually and in*  
*their representative capacities,*

Plaintiffs,

v.

WIPRO LIMITED,

Defendant.

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**Civil Action No. 3:20-cv-3414 (GC) (JBD)**

**JOINT PROPOSED AMENDED  
 DISCOVERY SCHEDULE**

In accordance with this Court's December 10, 2024 Order (Dkt. 81), the parties met and conferred on January 5, 2025 regarding how discovery should proceed in this case. The parties have reached consensus and now submit the below joint proposed amended discovery schedule:

<b>Event</b>	<b>Deadline</b>
<b>Non-Expert Discovery Cut-Off</b>	October 15, 2025
<b>Class Certification Motion Filing Deadline<sup>1</sup> Initial Expert Disclosure &amp; Report Deadline</b>	October 27, 2025
<b>Opposition to Class Certification Motion Rebuttal Expert Disclosure &amp; Report Deadline</b>	December 3, 2025
<b>Reply in Support of Class Certification Mot. &amp; Plaintiffs' Rebuttal Expert Disclosure &amp; Report Deadline</b>	December 31, 2025
<b>Dispositive Motions</b>	March 2, 2026
<b>Responses to Dispositive Motions</b>	April 6, 2026
<b>Replies to Dispositive Motions</b>	April 27, 2026

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<sup>1</sup> If a class is certified, the parties may file supplemental expert reports for trial by the Expert Discovery Cut-Off deadline.

Event	Deadline
Expert Discovery Cut-Off	May 18, 2026

We thank the Court for its attention to this matter.

Dated: January 10, 2025

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